

**MICHAEL M. EDWARDS**

Nevada Bar No. 6281

E-Mail: [Michael.Edwards@wilsonelser.com](mailto:Michael.Edwards@wilsonelser.com)

**J. SCOTT BURRIS**

Nevada Bar 10529

E-Mail: [J.Scott.Burris@wilsonelser.com](mailto:J.Scott.Burris@wilsonelser.com)

**WILSON ELSEER MOSKOWITZ EDELMAN & DICKER LLP**

300 South Fourth Street, 11<sup>th</sup> Floor

Las Vegas, NV 89101

Tele: 702. 727.1400

Fax: 702. 727.1401

Attorneys for Plaintiff

*Principal Financial Services, Inc.*

Richard B. Biagi (admitted *pro hac vice*)

Illinois Bar No. 6274572

E-Mail: [rbiagi@nealmcdevitt.com](mailto:rbiagi@nealmcdevitt.com)

Kevin J. McDevitt (admitted *pro hac vice*)

Illinois Bar No. 6205086

E-Mail: [kmcdevitt@nealmcdevitt.com](mailto:kmcdevitt@nealmcdevitt.com)

Jeremy M. Roe (admitted *pro hac vice*)

Illinois Bar No. 6296443

E-Mail: [jroe@nealmcdevitt.com](mailto:jroe@nealmcdevitt.com)

**NEAL & McDEVITT, LLC**

1776 Ash Street

Northfield, Illinois 60093

Tele. 847.441.9100

Fax 847.441.0911

**THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF NEVADA**

PRINCIPAL FINANCIAL SERVICES, INC.,

Plaintiff,

v.

PFRESOURCES, LLC, *et al.*

Defendants.

Case No. 2:11-cv-00009-KJD-LRL

**SECOND STIPULATED MOTION TO  
EXTEND DISCOVERY DEADLINES**

1 Plaintiff PRINCIPAL FINANCIAL SERVICES, INC. ("Principal"), with the consent of  
 2 Defendant PFRESOURCES, LLC ("PFR"), moves the Court for good cause, and not merely for  
 3 purposes of delay, to amend the Stipulated Discovery Plan and Scheduling Order in this action.  
 4

5 The parties jointly submitted their Stipulated Discovery Plan and Scheduling Order on March  
 6 14, 2011. (Docket No. 27) On June 8, 2011, Principal filed a Stipulated Motion to Extend  
 7 Discovery Deadlines, in light of open discovery issues amongst the parties. (Docket No. 33). The  
 8 Court granted this Motion on June 15, 2011. (Docket No. 35)

9 The parties are actively engaged in settlement discussions and appear to be close to a  
 10 resolution. In light of this development, PFR's counsel, Doris Nehme-Tomalka, expressly consented  
 11 to the filing of this Motion during a telephone discussion with Principal's counsel, Rick Biagi, on  
 12 July 12, 2011.

13 Accordingly, Principal moves the Court to amend the current Stipulated Discovery Plan and  
 14 Scheduling Order by extending all dates in the Order by sixty (60) days, as follows:

15 Amending the Pleadings and Adding Parties:	August 26, 2011
16 Expert Disclosures:	September 24, 2011
17 Rebuttal Expert Disclosures:	October 25, 2011
18 Discovery Cut-Off Date:	November 22, 2011
19 Extensions/Modifications to Scheduling Order:	November 22, 2011
20 Dispositive Motion Deadline:	December 22, 2011
21 Pretrial Order Deadline:	January 21, 2012

22 **IT IS SO ORDERED.**

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U.S. MAGISTRATE JUDGE

25  
 26 Date: 7-15-11

Respectfully submitted,

/s/ J. Scott Burris  
Richard B. Biagi (admitted *pro hac vice*)  
Illinois Bar No. 6274572  
E-Mail: [rbiagi@nealmcdevitt.com](mailto:rbiagi@nealmcdevitt.com)  
Kevin J. McDevitt (admitted *pro hac vice*)  
Illinois Bar No. 6205086  
E-Mail: [kmcdevitt@nealmcdevitt.com](mailto:kmcdevitt@nealmcdevitt.com)  
Jeremy M. Roe (admitted *pro hac vice*)  
Illinois Bar No. 6296443  
E-Mail: [jroe@nealmcdevitt.com](mailto:jroe@nealmcdevitt.com)  
NEAL & MCDEVITT, LLC  
1776 Ash Street  
Northfield, Illinois 60093  
847.441.9100; Fax 847.441.0911

Michael M. Edwards  
J. Scott Burris  
Wilson Elser Moskowitz Edelman & Dicker LLP  
300 South 4th Street, 11th Floor  
Las Vegas, NV 89101-6014  
[michael.edwards@wilsonelser.com](mailto:michael.edwards@wilsonelser.com)  
[j.scott.burris@wilsonelser.com](mailto:j.scott.burris@wilsonelser.com)  
702.727.1400; Fax 702.727.1401  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of July, 2011, I electronically filed a copy of **SECOND STIPULATED MOTION TO EXTEND DISCOVERY DEADLINES**. Notice of this filing will be sent by operation of the Court's electronic filing system to the parties. Parties may access this filing through the Court's ECF system.

/s/ J. Scott Burris  
*One of the Attorneys for Plaintiff*